

Shaughnessy No.: 103601

Date Out of EFGWB: JUL 5 1990

To: E. Feris  
Product Manager 74  
Registration Division

From: Henry Nelson, Acting Chief *H Nelson*  
Environmental Chemistry Review Section #3  
Environmental Fate and Ground Water Branch/EFED

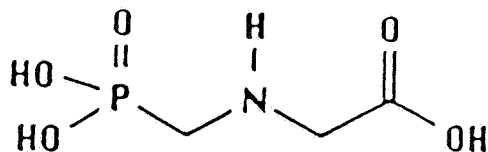
Through: Henry Jacoby, Chief *Henry Jacoby*  
Environmental Fate and Ground Water Branch/EFED

Attached, please find the EFGWB review of . . .

Reg./File # : 524-308  
Common Name : Glyphosate  
Type Product : Herbicide  
Product Name : \_\_\_\_\_  
Company Name : Monsanto  
Purpose : Field dissipations data review  
Date Received: \_\_\_\_\_ EFGWB # (s): 90400  
Action Code : 660

Deferrals to: \_\_\_\_\_ Ecological Effects Branch, EFED  
\_\_\_\_\_ Science Integration and Policy Staff,  
\_\_\_\_\_ Non-Dietary Exposure Branch, HED  
\_\_\_\_\_ Dietary Exposure Branch, HED  
\_\_\_\_\_ Toxicology Branch I, HED  
\_\_\_\_\_ Toxicology Branch II, HED

1. CHEMICAL: Glyphosate



2. TEST MATERIAL: Commercial material.
3. STUDY/ACTION TYPE: Review field dissipation studies.
4. STUDY IDENTIFICATION:

Addendum to MSL-3210-Dissipation of glyphosate in US field soils following direct applications of Roundup Herbicide by M.G. Mueth of Monsanto Agricultural Company. MRID 41096103

5. REVIEWED BY:

A. Abramovitch, Ph.D.  
Chemist  
EFGWB/EFED/OPP  
Review Section #3

Signature:

Date: JUN 29 1990

6. APPROVED BY:

Henry Nelson, Ph.D.  
Acting Chief  
EFGWB/EFED/OPP  
Review Section #3

Signature:

Date: 7/2/90

7. CONCLUSION:

The studies for which the addendum was submitted were found to have major deficiencies in EFGWB review of January 27, 1988 (see attachment of EFGWB 70727-29). The data were too variable, samples intervals were inadequate to establish half lives and the pattern of decline of parent and formation of degradates were not properly addressed. These deficiencies cannot be rectified and new studies should be conducted. Rectifying some of the deficiencies cited such as lack of weather data, test samples and soil characterization cannot render the studies acceptable.

8. RECOMMENDATIONS:

The status of the data requirements on glyphosate was discussed in Two January 27, 1988 EFGWB reviews (attached). Since then, the photodegradation on soil has been satisfied in the EFGWB review of June 28, 1990.

9. BACKGROUND:

A. Introduction Two field dissipation studies (Danhou, 264343 and Danhou 264332) were reviewed by EFGWB and found unacceptable as indicated by January 27, 1988 EFGWB reviews. The registrant attempted to render the previously reviewed studies acceptable with this submission.

B. Directions for Use No label attached.

10. DISCUSSION OF INDIVIDUAL TESTS OR STUDIES: See discussion, above

11. COMPLETION OF ONE-LINER: Updated

12. CBI APPENDIX: None



United States Environmental Protection Agency  
Office of Pesticide Programs  
Washington, DC 20460

## Data Review Record

Confidential Business Information - Does not contain  
National Security Information (E.O. 12065)

Pack Number

Date Received

50175

EFED

2-28-90

1. Product Name

Chemical Name

Glyphosate

2. Identifying Number	3. Record Number	4. Action Code	5. MRID/ Accession Number	6. Study Guideline or Narrative
524-308	260349	660	41096103	164-1

7. Reference No.	8. Date Rec'd (EPA)	9. Prod/Review Mgr/DCI	10. PM/RM Team No.	11. Date to HED/ EFED/RD/BEAD	12. Proj Return Date	13. Date Returned to RD/SRRD
	5-16-89	E. FERIS	74	2-28-90	5-28-90	

## Instructions

This study is to upgrade 2 previously reviewed studies: 00264343 & 00264332.  
Will this now satisfy the guideline requirement?

0178 / 103601-1

## This Section Applies to Review of Studies Only

<b>14. Check Applicable Box</b> <input type="checkbox"/> Adverse 6(a)(2) Data (405) <input type="checkbox"/> Special Review Data (870) <input checked="" type="checkbox"/> Generic Data (Reregistration) (660) <input type="checkbox"/> Product Specific Data (Reregistration) (655)				<b>15. No. of Individual Studies Submitted</b> _____	
<b>16. Have any of the above studies (in whole or in part) been previously submitted for review?</b> <input type="checkbox"/> Yes (Please identify the study(ies)) <input type="checkbox"/> No				<b>17. Related Actions</b> _____	
18.	To	Type of Review	19. Reviews Also Sent to		20. Data Review Criteria
HED		Science Analysis & Coordination	<input type="checkbox"/> SAC	<input type="checkbox"/> PC	<b>A. Policy Note No. 31</b> <input type="checkbox"/> 1 = data which meet 6(a)(2) or meet 3(c)(2)(B) flagging criteria <input type="checkbox"/> 2 = data of particular concern from registration standard <input type="checkbox"/> 3 = data necessary to determine tiered testing requirements
		Toxicology/HFA	<input type="checkbox"/> TOX/HFA	<input type="checkbox"/> PL	
		Toxicology/IR	<input type="checkbox"/> TOX/IR	<input type="checkbox"/> EA	
		Dietary Exposure	<input type="checkbox"/> DEB	<input type="checkbox"/> AC	
		Nondietary Exposure	<input type="checkbox"/> NDE	<input type="checkbox"/> BA	
EFED	<input checked="" type="checkbox"/>	Ecological Effects	<input type="checkbox"/> EEB	<input type="checkbox"/>	<b>B. Section 18</b> <input type="checkbox"/> 1 = data in support of section 3 in lieu of section 18 <b>C. Inert Ingredients</b> <input type="checkbox"/> 1 = data in support of continued use of List 1 inert
SRRD		Environmental Fate & Groundwater	<input type="checkbox"/> EFGWB	<input type="checkbox"/>	
		Special Review	<input type="checkbox"/>	<input type="checkbox"/>	
		Reregistration	<input type="checkbox"/>	<input type="checkbox"/>	
RD		Generic Chemical Support	<input type="checkbox"/> SR	<input type="checkbox"/>	
		Insecticide-Rodenticide	<input type="checkbox"/> RER	<input type="checkbox"/>	
		Fungicide-Herbicide	<input type="checkbox"/> GSC	<input type="checkbox"/>	
		Antimicrobial	<input type="checkbox"/> IR	<input type="checkbox"/>	
		Product Chemistry	<input type="checkbox"/> FH	<input type="checkbox"/>	
BEAD		Precautionary Labeling	<input type="checkbox"/> AM	<input type="checkbox"/>	
		Economic Analysis			
		Analytical Chemistry			
		Biological Analysis			
<input type="checkbox"/> Confidential Statement of Formula (EPA Form 8570-4) Attached (Trade Secrets)				<input type="checkbox"/> Label Attached	